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September 21, 2006

Via Electronic Submission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby – TW-A325
Washington, D.C. 20554

Re: Ex Parte – In the Matter of Implementation of the Telecommunications Act of 1996 - Telecommunications Carriers' Use of Customer Proprietary Network Information and other Customer Information, CC Docket No. 96-115; Petition for Rulemaking to Enhance Security and Authentication Standards for Access to Customer Proprietary Network Information, RM-11277

Dear Ms. Dortch:

On September 20, 2006, Celia Nogales – Executive Director, Davida Grant – Senior Counsel and the undersigned met with William Dever, Tim Stelzig, Adam Kirschenbaum and Cindy Spiers of the Wireline Competition Bureau to discuss the above referenced proceeding. At the meeting AT&T discussed the following: (a) its security measures to protect customer private information, (b) the existing opt out regime and its relation to pretexting; (c) its safe harbor proposal; and (d) its ongoing efforts to better protect its customers' call detail records. AT&T urged the Commission to consider adoption of safe harbor guidelines, which would serve as a *de facto* industry standard, while allowing a carrier the necessary flexibility to implement those measures more appropriate and effective to safeguard its customers' proprietary network information.

Should you have any questions, feel free to contact me.

Sincerely,

/s/ **Anisa A. Latif**

Anisa A. Latif, Associate Director

Attachment

cc: William Dever
Tim Stelzig
Adam Kirschenbaum
Cindy Spiers

CPNI NPRM FCC Ex Parte Meeting

AT&T's position on the Commission's
exploration into allegations of unauthorized
access to CPNI by data brokers.

Protection of Consumer Information

- AT&T takes its duty to protect consumer information very seriously.
- AT&T has procedures in place designed to ensure private information is kept private.
- AT&T remains steadfast in its commitment to proactively safeguard its customer's private information from fraudsters.
- Most carriers on the record share in AT&T's commitment to protect their customer's private information.

Opt Out Regime Not an Issue Here

- This proceeding does not necessitate re-examination of the Commission's Opt Out rules
- Proponents of an Opt In Regime are using this as a way to re-open a proceeding that has been examined and ruled by the Commission already.
- Re-examination of the Opt Out rules have no relation to finding a solution to preventing unauthorized access by fraudsters.
- Nothing has changed – Opt Out remains as the less burdensome alternative to Opt In and remains adequate to address consumer privacy interests.

AT&T's Safe Harbor Proposal

- Written Procedures
- Training of personnel
- Customer authentication
- Optional Password Protection
- Customer notification of unauthorized access/disclosure of CPNI

The Bottom Line

- A one size fits all approach will not work in preventing pretexting.
- Carriers need flexibility to truly address the issues of pretexting.
- A safe harbor gives the type of flexibility AT&T (and other carriers) seek in order to effectively address this issue.